



American Roaming Network, Inc.
7999 North Federal Hwy., 4th Floor
Boca Raton, Florida 33487

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Chairman Genachowski:

I am respectfully submitting this correspondence as a concerned business owner of American Roaming Network, a small company located in Boca Raton, Florida that employs 8 people. American Roaming Network serves US wireless carriers and provides an alternative payment service for manual roaming per FCC 05-160. When an unregistered roamer enters the serving carrier's market, the switch sends the call to American Roaming Network's billing processing platform and the caller is presented alternative billing.

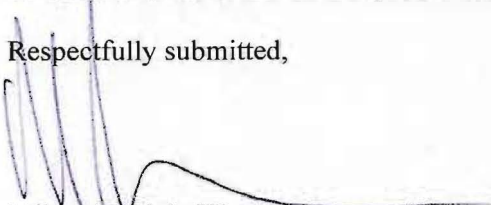
We are in strong support of the FCC's efforts to protect consumers from phone bill cramming. However, we also strongly believe that third-party billing services are of great benefit to businesses and consumers alike, and that these services must be preserved in any new rules that are implemented for the industry.

Thousands of businesses across the nation appreciate the benefits of third-party billing, including the ability to reduce administrative costs and consolidate charges for services onto a single bill. Additionally, millions of consumers each year are able to purchase services at competitive rates, with a billing option that does not require them to open an additional line of credit or manage yet another bill.

As a result of third-party billing services, companies have been able to offer our customers a flexible and convenient billing option that saves them time and money, which has helped us to remain competitive in today's challenging market. Banning third-party billing would unnecessarily harm businesses like ours, as well as the consumers.

American Roaming Network supports your important goal of protecting consumers from cramming. However, we believe that this is best achieved through the implementation of reasonable measures, not through an outright ban of a service that is valued by millions of consumers. As you consider applying the rules in your Notice for Proposed Rulemaking, we urge you to consider the potential financial impact.

Respectfully submitted,



Milton V. Volz III
President
American Roaming Network, Inc.